

Message

From: Stovern, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2C79989D003E4FC8A92A5B3BD080F961-STOVERN, MI]
Sent: 10/31/2018 5:09:31 PM
To: Johnson, Steffan [johnson.steffan@epa.gov]
Subject: FW: [SPAM-Sender] Question: 40CFR 60, §60.5413a(b)
Attachments: Method 19 Ex Calc - Upstream VCU.pdf

Hi Stef,

I received a question from a stack test company related to NSPS OOOOa control device testing. I looked at the

Ex. 5 Deliberative Process (DP)

What do you think of their request?

Thanks,

Michael Stovern
Air and Toxics Enforcement
U.S. EPA, Region 8 (8ENF-AT)
1595 Wynkoop Street
Denver, CO 80202-1129
303-312-6635 (office)
Stovern.Michael@epa.gov

From: Jason Dunn <JDunn@erthwrks.com>
Sent: Wednesday, October 31, 2018 6:34 AM
To: Stovern, Michael <Stovern.Michael@epa.gov>
Subject: [SPAM-Sender] Question: 40CFR 60, §60.5413a(b)

Mr. Stovern,

I am working on a test protocol for a VCU at an O&G production/storage vessel facility in Weld County, CO. Pursuant to §60.5413a(b)(2), is it necessary to conduct Method 2 even if the VCU does not operate continuously?

I have encountered several VCUs that operate intermittently, and conducting Method 2 on the exhaust of the unit is nearly impossible due to the dynamic combustion zone.

We will be measuring the inlet gas flow rate via Method 2A or Method 2D. Is it acceptable to use Method 19 in conjunction with Method 2A/2D to calculate the exhaust TOC? I have attached an example calculation.

Looking forward to hearing what you think.

Thank you,

Jason Dunn
Emissions Testing Project Manager
Erthwrks, Inc.

PO Box 16528
Denver, CO 80216
614.565.9177 ph
888.573.9994 fx
jdunn@erthwrks.com



This transmission is intended to be delivered only to the named addressee(s) and may contain information that is confidential, proprietary or privileged. If this information is received by anyone other than the named addressee(s), the recipient should immediately notify the sender by e-mail and by telephone {614}565-9177 and obtain instructions as to the disposal of the transmitted material. In no event shall this material be read, used, copied, reproduced, stored or retained by anyone other than the named addressee(s), except with the express consent of the sender or the named addressee(s). If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution, copying or storage of this message or any attachment is strictly prohibited and to do so might constitute a violation of the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521.